

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

NOTICE OF MOTION

- against -

Case No.: CR-17-522 (SJF)

JOHN AMBROSIO,

Defendant.
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PLEASE TAKE NOTICE, that upon the annexed declaration of Michael J. Alber, an attorney admitted to practice in the Federal Courts, duly declared on the 13th day of April 2021, the undersigned will move the United States District Court, Eastern District of New York, at the Courthouse Long Island Courthouse, Central Islip, New York, on the ____ th of April, 2021 for the following designated Orders:

- I. GRANTING THE MOTION FOR THE IMMEDIATE RELEASE OF JOHN AMBROSIO FROM THE FEDERAL PRISON AND ORDERING HIM TO SERVE THE REMAINDER OF HIS CUSTODIAL TERM IN HOME DETENTION BECAUSE THERE ARE “EXTRAORDINARY AND COMPELLING REASONS WARRANT SUCH A REDUCTION” AS A RESULT OF THE CORONAVIRUS PANDEMIC [18 U.S.C.A. § 3582 (c)(1)(A)]; and**
- II. GRANTING SUCH OTHER AND FURTHER RELIEF AS IS JUST AND PROPER.**

Dated: Huntington, New York
April 13, 2021

Yours, etc.,

LAW OFFICES OF MICHAEL J. ALBER

_____/s/_____
By: Michael J. Alber
21 Walt Whitman Rd
Huntington Station, NY 11746-3685

